



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

KELLYANNE HOLOHAN
Assistant Corporation Counsel
Phone: (212) 356-2422
Fax: (212) 356-3509
kholohan@law.nyc.gov

March 23, 2023

BY ECF

Honorable Jennifer L. Rochon
United States District Judge
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: My'Asha Roundtree v. City of New York, et al.,
21-CV-10576 (MKV) (SDA)

Your Honor:

I am an attorney representing defendants the City of New York, Det. Andy Urena, and Lt. Michael Dunn (hereinafter "City defendants") in the above referenced action. City defendants write to respectfully request that Your Honor extend the deadline by which Plaintiff must make an application for the Court to fix the amount of reasonable attorney's fees, costs, and expenses in this case, until April 27, 2023. Per the Court's rules, (1) the current deadline is March 27, 2023, (2) this is the fifth request for an extension of the deadline by which to submit the application, (3) the previous requests were granted, and (4) counsel for plaintiff, Remy Green, Esq., consents to this request.

By way of brief background, Ms. Roundtree accepted an offer of judgment pursuant to Fed.R.Civ.P. 68 from the City Defendants and the Court entered judgment thereon. *See* Dkt. No. 60. Plaintiff's claims against the remaining defendants were subsequently resolved, *see* Dkt. No. 75, and now the only issue remaining is the fees due under the City Defendants' offer. The Court has previously granted four extension requests related to those fees. *See* Dkt. Nos. 68, 77, 79, and 80.

Since the prior extension, the parties have agreed to a settlement regarding the attorneys fees. However, unfortunately, due to conflicting professional obligations, including unforeseen circumstances, the undersigned is unable to provide a draft of the necessary paperwork to counsel for plaintiff until next week. City defendants apologize for the delay.

Therefore, along with counsel for plaintiff, defendants respectfully request that the Court extend the March 27, 2023, deadline by which Plaintiff must file an application for the Court to fix reasonable attorneys' fees, expenses, and costs until April 27, 2023.

City defendants sincerely thank the Court for its time and attention to this matter.

Respectfully submitted,

KellyAnne Holohan /s/

KellyAnne Holohan

Assistant Corporation Counsel

cc: All Counsel of Record (via ECF)